



# **EXHIBIT 19**

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

\_\_\_\_\_  
)  
)  
SUPER INTERCONNECT TECHNOLOGIES, )  
LLC, )

)  
)  
Plaintiff, )  
v. )  
\_\_\_\_\_ )

) Civil Action No.  
) 2:18-cv-00462-JRG  
HUAWEI DEVICE CO. LTD., et al., ) LEAD CASE  
\_\_\_\_\_ )  
)

GOOGLE LLC, ) Civil Action No.  
) 2:18-cv-00463-JRG  
Defendant. )  
\_\_\_\_\_

VIDEO DEPOSITION OF ERIC LUCAS  
Newport Beach, California  
Friday, December 20, 2019  
Volume I

Reported by:  
Gail E. Kenamer, CSR 4583, CCRR  
Job No. 3804813  
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1           Then I went to Motorola. 09:39

2           Then I worked at Cambridge Display Technologies.

3           Then Boeing.

4           Then Alcatel.

5           Then I worked for a few smaller companies as a 09:40

6           licensing attorney.

7           Then I worked for Acacia for the last six or

8           six-and-a-half years. Most of those positions were in a

9           licensing capacity.

10          Q.    So you mentioned working on patent or IP 09:40

11           licensing before Acacia; is that right?

12          A.    Yes.

13          Q.    What were those specific employers and

14           positions?

15          A.    I believe every place I mentioned was a 09:40

16           licensing position.

17          Q.    I see.

18           And when did you join Acacia?

19          A.    I believe it was around March 2012 or

20           April 2012. 09:40

21          Q.    And what was your title when you first joined

22           Acacia?

23          A.    I believe it was senior vice president.

24          Q.    What's your title today?

25          A.    Senior vice president, licensing and litigation. 09:41

1 Q. You mentioned this at the beginning, but I just 09:41  
2 want to confirm.

3 Are you a senior VP of Acacia Corporation or Research  
4 Group?

5 A. Acacia Research Group. 09:41

6 Q. Do you hold any positions in any other Acacia  
7 entities?

8 A. The subsidiaries, I do.

9 Q. What about Acacia Corporation?

10 A. I don't have a title there. 09:41

11 Q. In your role as senior VP of licensing at Acacia  
12 Research Group, could you describe your responsibilities  
13 and tasks?

14 A. Yeah. We are -- I'm responsible for helping to  
15 evaluate portfolios that we're looking to purchase and 09:41  
16 also financial litigation and try to license the patents  
17 that we already own.

18 Q. Do you hold any positions with SIT?

19 A. I'm the president.

20 Q. And that role as president of SIT, what are your 09:42  
21 day-to-day responsibilities?

22 A. I wouldn't say there are any day-to-day  
23 responsibilities associated with that.

24 Q. Why do you say there's no day-to-day  
25 responsibilities? 09:42

1 Q. So there are more employees at the subsidiary 09:49  
2 Acacia Research Group than the parent Acacia Research  
3 Corporation?

4 A. I believe so, yes.

5 Q. I just want to -- I think I may have skipped 09:49  
6 this -- there are no SIT employees who are only employees  
7 of SIT but not also SIT -- employees of Acacia Research  
8 Group; correct?

9 A. I believe that's correct.

10 Q. [REDACTED]  
[REDACTED] Where are they located?

12 A. [REDACTED]

13 [REDACTED]

14 Q. [REDACTED]  
15 where are they located? 09:50

16 A. We have some people in Irvine, some people in  
17 New York, [REDACTED] in Texas.

18 Q. How many are in Irvine?

19 A. [REDACTED]

20 Q. Now, SIT is located in Texas; right? 09:50

21 A. I didn't study the states of incorporation, but  
22 I believe it may be incorporated in Texas.

23 Q. Could you tell me SIT's address right now?

24 A. No, I can't.

25 Q. Do you know what city they are located in? 09:51